

November 18, 2019

MEMORANDUM ENDORSED

VIA ECF

Hon. Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 12C
New York, New York 10007-1312

Re: *Hakuta v. Werthein*, No. 1:19-cv-7398-GHW

Dear Judge Woods:

This firm represents Defendants Cactus Technologies LLC (“Cactus”), Noah Waxman, and Lucas Werthein in the above-referenced case. I write jointly with counsel for Plaintiffs to request that all pending deadlines be adjourned and that the case be stayed to permit the parties to continue to engage in settlement discussions.

By order dated September 19, 2019, the Court referred the parties to mediation. ECF No. 7. The parties engaged in a productive mediation session on November 13, 2019. The parties continue to negotiate in good faith and are optimistic that they will be able to reach a settlement.

To that end, the parties respectfully request that all pending deadlines—including the December 2, 2019 deadline for Cactus, Mr. Waxman, and Mr. Werthein to respond to the complaint and the December 20 initial pretrial conference—be adjourned and that the case be stayed for a period of sixty days to permit the parties to continue settlement discussions. Staying these proceedings will allow the parties to focus their attention on resolving the case, thereby preserving the parties’ and the Court’s resources. Further, the stay will not prejudice either party or the Court, as there is no scheduling order currently in place, and the stay is for a limited duration.

We are of course happy to discuss these or any other issues at the Court’s convenience.

Respectfully submitted,

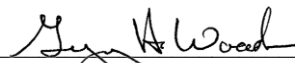
/s/ Alan E. Schoenfeld

Application granted. The deadline for Defendants to answer or otherwise respond to the complaint is extended until February 2, 2020. The case is stayed until that date as well. The initial pretrial conference scheduled for December 20, 2019 is adjourned until February 14, 2020 at 3 p.m. The joint letter and proposed case management plan described in the Court’s September 10, 2019 Order, Dkt No. 6, is due no later than February 7, 2020.

The Clerk of Court is directed to terminate the motion pending at Dkt No. 18.

SO ORDERED.

Dated: November 25, 2019
New York, New York


GREGORY H. WOODS
United States District Judge